

ORIGINAL

MM 99-25

LOW POWER FM RADIO STATIONS  
A STUDY ON POTENTIAL IMPACT  
ON VICTORIA, TEXAS , RADIO  
MARKET

EX PARTE OR LATE FILED

RECEIVED  
NOV 15 1999  
FCC MAIL ROOM

Study in accordance with part 47 of the  
Code of Federal Regulations, section 73 and  
in application of the procedures as outlined  
in Mass Media Docket 99-25

Due November 5, 1999

John J. (Joe) Tibiletti  
President KTXN-Fm 98.7  
2618 FM 1685  
Victoria, Texas, 77905  
361-645-2487

No. of Copies rec'd 2 copies  
List ABCDE

## INDEX

CONSIDERATIONS OF PLANS ONE AND PLAN TWO.....	I
COMMENTS ON ELEMENTS USED IN THIS MODEL.....	II
PLAN ONE --TABOOS AND THEIR AFFECTS ON POTENTIAL NEW ALLOCATIONS.....	III
PLAN TWO -- TABOOS AND THEIR AFFECTS ON POTENTIAL NEW ALLOCATIONS.....	IV

### PLAN ONE

FREQUENCIES 88.1 TO 93.9 MEGAHERTZ.....	1
FREQUENCIES 94.1 TO 99.9 MEGAHERTZ.....	2
FREQUENCIES 100.1 TO 105.9 MEGAHERTZ.....	3
FREQUENCIES 106.1 TO 107.9 MEGAHERTZ.....	4

### PLAN TWO

FREQUENCIES 88.1 TO 93.9 MEGAHERTZ .	
10 TO 100 WATTS.....	5
500 TO 1000 WATTS.....	6
FREQUENCIES 94.1 TO 99.9 MEGAHERTZ.	
10 TO 100 WATTS.....	7
500 TO 1000 WATTS.....	8
FREQUENCIES 100.1 TO 105.9 MEGAHERTZ	
10 TO 100 WATTS.....	9
500 TO 1000 WATTS.....	10
FREQUENCIES 106.1 TO 107.9 MEGAHERTZ	
10 TO 100 WATTS.....	11
500 TO 1000 WATTS.....	12

## GRAND RECAPITULATION NEW STATION CHANNELS

### PLAN ONE AND PLAN TWO BY CHANNELS:

88.1 TO 92.9.....	13
93.1 TO 98.9.....	14
99.1 TO 104.9.....	15
105.1 TO 107.9.....	16
MASTER FINDINGS OF PLAN ONE VERSUS TWO	16

## CONSIDERATIONS OF PLAN ONE AND PLAN TWO

### Page i.

The considerations of plans one and plan two are to show the availability or non-availability of frequency modulation radio channels on the frequencies of 88.1-107.9 megahertz in the radio markets in general, with the Victoria, Texas, radio market, which is the location of commentor John J.(Joe) Tibiletti owned KTXN-FM, which operates on 98.7 megahertz, with 100 thousand watts as a class C1 station.

All guidelines for the development of this tabular presentation were taken from the Code of Federal Regulations, Part 47, sub part 73, related to Telecommunications. The allocation process to be explained in later pages is contained in this section. A new rulemaking docket mass media 99-25 is proposing the addition of thousands of new low power radio stations with powers from one to one thousand watts on the frequencies already used in the industry.

The purpose of this presentation is to show the impact these stations would make on the overall radio spectrum of 88.1- 107.9 megahertz in this radio market. The entire responsibility for information contained in this is solely that of a self trained allocation engineer-radio station operator John J (Joe) Tibiletti. While other implications can be made relative to this docket, this tabular presentation is solely to show the possible new allocations that can be made in the abovedescribed radio market.

Commentor Tibiletti wishes to call the attention of readers of this material to the fact that the Federal Communications Commission, while it purported to have a disk to use to find the available channels, was unable to supply one to him in spite of over four months of requests for same. Thus this was done with the only tools available: an internet site which gave a data base extract for the area with a list of stations, which was supplemented by a check of the proposed rulemakings in the area on the channels involved; an accounting 13 columnar tablet; a pencil and a ruler, and a hand held low level calculator. ...

## Comments on elements used in this model

Page ii.

We now take the steps of walking reader through the elements used in this presentation

### **PLAN ONE -- TABOOS OF 1<sup>ST</sup>, 2<sup>ND</sup>, AND 3<sup>RD</sup> ADJACENT CHANNELS:**

**NO LOCAL NEW STATIONS WITHIN ANY OF THESE CHANNELS IN BOXES**

Frequency (in megahertz) is the carrier frequency of stations involved.

Area local call is the call letter of station which is located in the market.

3<sup>rd</sup>. Adj. Channel is the third plus or minus from the local station's carrier  
it operates on a frequency of 600 kilohertz from this carrier.

2<sup>nd</sup>. Adj. Channel is the second plus or minus from the local station's carrier  
it operates on a frequency of 400 kilohertz from this carrier.

1<sup>st</sup> Adj. Channel is the first (or immediate closest) channel to the local station  
carrier frequency and operates on 200 kilohertz from this carrier.

Co-channel is the same channel or frequency that the local station uses.

Note in the box under co channel is located the call letters of station involved.

Note column is used for the number showing the location of the channel versus

The local station's carrier frequency: ,2 , or 3.

Unavailable column is used for 1<sup>st</sup> adjacent channel or co channel info.

A zero indicates it is the co channel of local station...

Open column indicates that there is no station in the area in question

In this case 100 miles. Commentor agrees that Commission is now utilizing

Kilometers -- 160 kilometers = 100 miles, however for sake of often occurring

Mind set, the mile is used herein... No comment editorially is implied.

### **PLAN TWO -- WITH TABOOS RELAXED NEW STATIONS TO BE CONSIDERED FOR ALL BUT CO AND FIRST ADJACENT CHANNEL TO EXISTING STATION(S).**

Further elaboration of terms and items used in this presentation:

Classes of station pertain to the existing station and its class as determined by the  
Federal Communications Commission.:

A	6 kilowatts	100 meters	coverage area of 17.4 miles (protected)
C3	25 kilowatts	100 meters	24.2
C2	50 kilowatts	150 meters	32.3
C1	100 kilowatts	300 meters	44.7
C	100 kilowatts	600 meters	57.2

Distance miles is the site in question that of commentor's KTXN-FM from

The existing station , or in three instances, or a site for a rulemaking for

A new station. Distance cleared is the distance in miles from site that the Protected contour falls.

The new proposed low power FM stations are in four categories. 1 to 10 Watts which have a coverage radius of 1.96 miles, and are required to Have a 6.34 miles from this contour for a co channel station of like power To be located, while the first adjacent channel can be located at 2.75 miles Away. The respective 100 watt, and next page 500 and 1000 watts are Described in the same way. Under the co-channel box of 6.34 --for exam Ple of 10 watts is a "Y", which indicates that this channel can be used on The tower of KTXN, while a N indicate there is none possible on this frequency On the tower. The large boxes with call letters and designation of local and the Call letters indicate the guard band for the local stations where no duplications Can exist. The frequency in the last column is a frequency that can be used on The tower in question...for example 88.1 and up to 100 watts can be used on The KTXN tower.

## PLAN ONE -- TABOOS AND THEIR AFFECTS ON POTENTIAL NEW ALLOCATIONS.

PAGE III.

This is the more restrictive of the plans considered, for it requires that a guard band around local stations of three channels to the minus and three to the positive be left vacant from the use of stations--either existing, existing wishing to change frequencies or facilities, or new considerations of rulemakings--as this one is. This means to the average potential station owner or low power devotee that the following rules apply for finding a frequency for the proposed station. KTXN FM operates on 98.7 megahertz with a tower of 77 meters and 100 kilowatts. Thus no new station proposal -- according to this plan -- can be located in the area that is bounded by various signal levels of KTXN; precisely

It means that you will have to be outside the 60 dbu contour of this station to consider the co channel of 98.7, then outside the same contour with your proposed 54 dbu contour which is based upon the commission's standards for a first adjacent channel station -- here on 98.5 or 98.9, then here is the contention of the Mass Media Docket 99-25. The petitioner, who wishes to do away with the second and third adjacent channel taboos, says that there is no interference caused to the existing station from stations on these channels. Presently the Federal Communications Commission says you are still not clear for that new low power station, for you have to clear the 60 dbu contour of KTXN for your 80 dbu contour -- which goes out to about two miles, for the second adjacent channel and then clear again the existing KTXN 60 DBU CONTOUR WITH THE PROPOSED 100

Dbu contour, which can go out sometimes to 1.5 miles. If it can be shown that there is no interference on the radio one uses for a receiver, then there just might be a new group of low power stations on the second and third adjacent channels... Well maybe! For there is one theory in electronics that states that a given existing station --KTXN AT 98.7 -- will mix with other frequencies to cause interference to another third station... Tibiletti finds this to be real. In Corpus Christi, KRYS operates on 99.1, while KSAV operates on 99.9. When one multiplies two times 99.1 and then takes away the frequency of the second station, namely 99.9, the resultant frequency of 98.3 is blanked out around the transmitter of KSAV. COMMENTOR WISHES TO CALL ATTENTION OF COMMISSION TO THIS PHENOMENON IN LOW POWER DELIBERATIONS..

## PLAN TWO -- TABOOS AND THEIR AFFECTS ON POTENTIAL NEW ALLOCATIONS. RELAXATION OF SECOND AND THIRD ADJACENT CHANNEL TABOOS

PAGE IV.

This is the lessor restrictive of the plans considered, for it requires that a guard band around local stations of three channels to the minus and three to the positive be open for the use of stations--either existing, existing wishing to change frequencies or facilities, or new considerations of rulemakings--as this one is--be relaxed to only consideration of the co-channel and the first adjacent channel on the minus and the positive sides. This means to the average potential station owner or low power devotee that the following rules apply for finding a frequency for the proposed station. KTXN FM operates on 98.7 megahertz with a tower of 77 meters and 100 kilowatts. Thus no new station proposal -- according to this plan -- can be located in the area that is bounded by various signal levels of KTXN; precisely

It means that you will have to be outside the 60 dbu contour of this station to consider the co channel of 98.7, then outside the same contour with your proposed 54 dbu contour which is based upon the commission's standards for a first adjacent channel station -- here on 98.5 or 98.9. Should the Mass Media Docket MM-99-25 be allowed to stand as new rulemaking the second and third adjacent channel taboos would be simply ignored, Supposedly there will be no interference caused to the existing station from stations on these channels. Then the Federal Communications Commission standards as they will amend will says you are now clear for that new low power station, for you have cleared the 60 dbu contour of KTXN for your co channel 40 dbu 10 per cent contour , and for the 54 dbu 10 per cent contour for your proposed second adjacent channel. Here is where the question still is to be answered. For your new proposed 80 dbu contour, which can go out sometimes to 1.5 miles and the 100 dbu contour still may interfere on radios and then what will be required remains a mystery. Will one be able to filter out the signal? . If it can be shown that there is no interference on the radio one uses for a receiver, then there just might be a new group of low power stations on the second and third adjacent channels...Well maybe! For there is one theory in electronics that states that a given existing station --KTXN AT 98.7 -- will mix with other frequencies to cause interference to another third station... Tibiletti finds this to be real. In Corpus Christi, KRYS operates on 99.1, while KSAV operates on 99.9. When one multiplies two times 99.1 and then takes away the frequency of the second station, namely 99.9, the resultant frequency of 98.3 is blanked out around the transmitter of KSAV. COMMENTOR WISHES TO CALL ATTENTION OF COMMISSION TO THIS PHENOMENON IN LOW POWER DELIBERATIONS..

In looking at the enclosed tabular presentation, one finds that there are checks and "y" under the co channel for everything from 10 watts to 1000 watts. The explanation is this. The channel is fitted from the lowest power first to the highest power, thus if a channel can be used for a 1000 watt station, there are checks in the 10 watt, 100 watt, 500 watt and the 1000 watt boxes, several channels are not available for this high power-- for example 96.3 can be used for powers up to 10 watts only..

The low power stations of 10 watts and under have been around for quite a while, however the Federal Communications Commission, in order to better utilize the broadcast spectrum ordered the 10 watt educational stations to increase their operating power to 100 watts. There are number of 10 watt stations in the armed forces overseas bases. There are a number of them in Canada, where it is licensed as very low power FM radio and are now being used to supplant the all but extinct 40 watt AM translators located at the Canadian National Railway stations..



PLAN ONE

FREQ  
MHZ  
88.1 3 5 7 9

KPLV

KXBS

KVRT

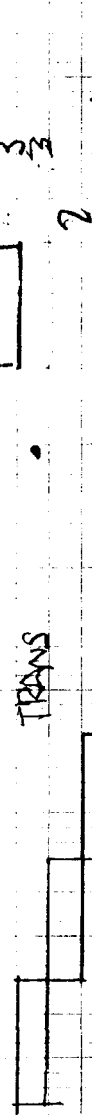
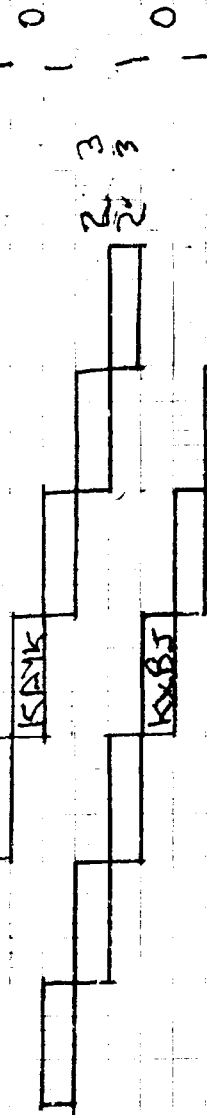
4

KVLT

KPLV

THREE CHANNELS ± TABOO

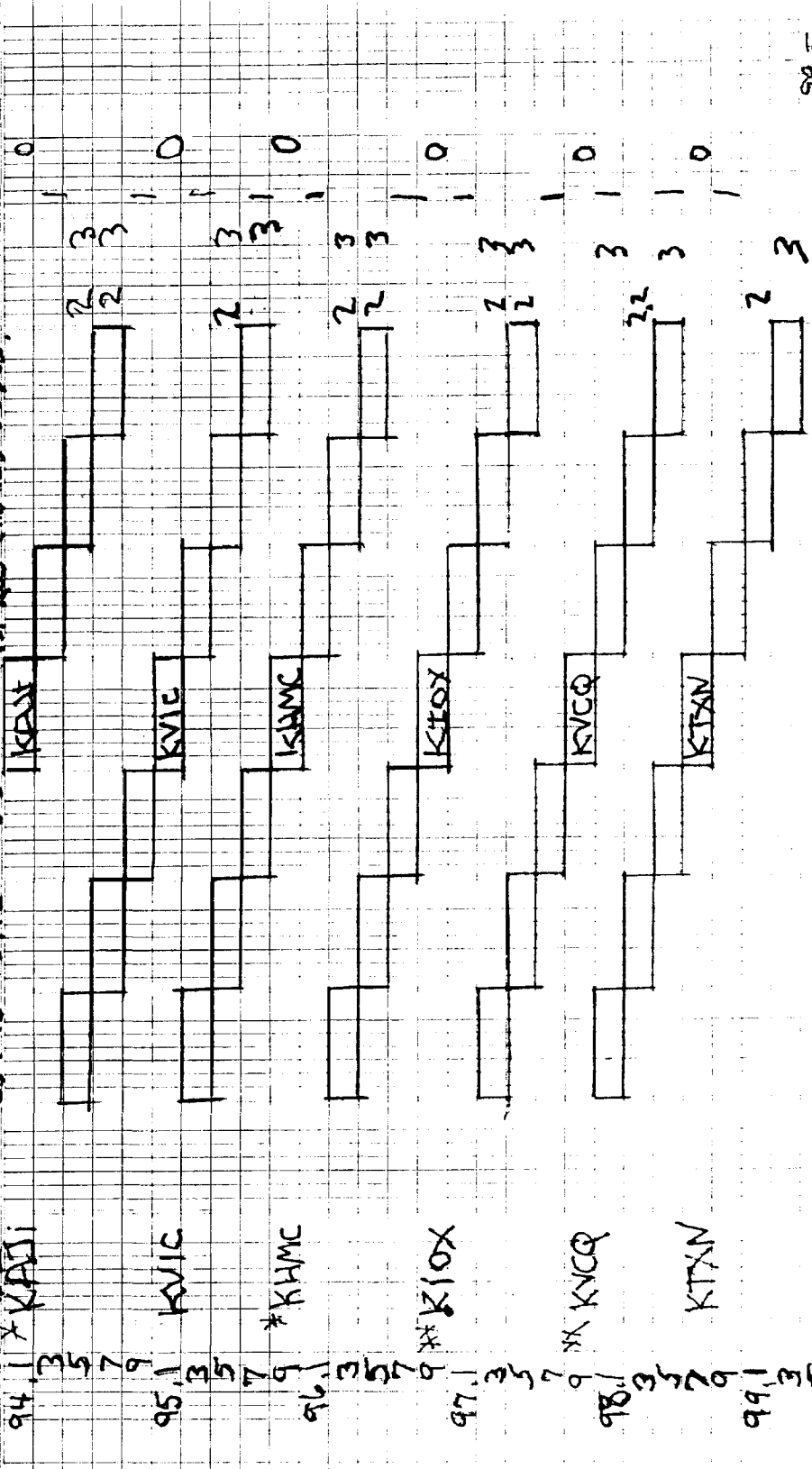
-600 -400 -200 CO- +200 +400 +600 NOTE UN- OPEN  
3D ADD 2ND ADD 1ST ADD CHAN 1ST ADD 2ND ADD 3D ADD



\* < 600BU  
 \*\* < 600BU

FILED AREA  
 1000L  
 30 APR 2008 15:05 CHAN 1ST ADT 2ND DOST 30 ADT  
 94 1 3 5 7 9  
 95 1 3 5 7 9  
 96 1 3 5 7 9  
 97 1 3 5 7 9  
 98 1 3 5 7 9  
 99 1 3 5 7 9

NOTE UN OPEN  
 DVAL



99.5

FRED AREA  
 LOCAL  
 CALL

600 400 200  
 300 200 100  
 100 000 000

CO-  
 CHAN

1200 1ST ADJ  
 1400 2ND ADJ  
 1600 3RD ADJ

NOTE  
 3

UN: 13  
 NVAL  
 OPEN

MUZ  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KERG  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KERG  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KERG  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KERG  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KERG  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*KOUL  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*KOUL  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*KOUL  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*KOUL  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*KOUL  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KZAM  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KZAM  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KZAM  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KZAM  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

KZAM  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*\*KMAT  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*\*KMAT  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*\*KMAT  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

\*\*KMAT  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

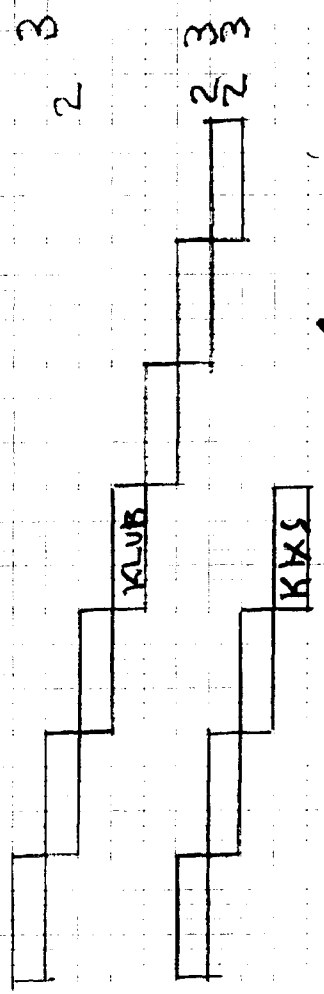
\*\*KMAT  
 100.1  
 101.1  
 102.1  
 103.1  
 104.1  
 105.1

AREA LOCAL  
 LOCAL  
 CALL

FRED  
 106.1 35.9  
 107.1 35.9

KLUB  
 KIXS

-600 -400 -200 CD- 1500 +200 +400 +600  
 30 ADS 20 ADS 10 ADS 15 ADS 20 ADS 30 ADS



2 3 1 0  
 2 3 1 0

UN

13  
 AVAIL. OPEN  
 100%

class of station---					distance	distance
A6	C3	c2	c1	c	distance to protected 60 dbu miles	cleared miles
17.4	24.2	32.3	44.7	57.2		

1-10 watt . -

60 dbu			100 watt		
protected	co-channel	1st adj	60 dbu	40 dbu	54 dbu
miles	miles	miles	protected	co-channel	1st adj
1.96	6.34	2.75	5.51	11.35	7.96

Prepared By \_\_\_\_\_

Approved By \_\_\_\_\_

12

13

17.4   24.2   32.3   44.7   57.2

7 7

LOCAL KAYK

LOCAL KXBI

LOCAL KURT

LOCAL NEW 91.5

## LOCAL KYLT

LOCAL KPLV

LOCAL KDWI

WOU ALF

7

---



WJON JONES  
LID

class of station---						distance	distance
A6	C3	c2	c1	c	distance to protected in miles	60 dbu miles	cleared miles
17.4	24.2	32.3	44.7	57.2			

1-10 watt			100 watt		
60 dbu protect. miles	40 dbu co-chan. 1st adj miles	54 dbu 1st adj miles	60 dbu protect. miles	40 dbu co-char. 1st adj miles	54 dbu 1st adj miles
1.96	6.34	2.75	3.51	11.56	4.92

Prepared By	Initials	Date
	7	
Approved By		

94	1	KAJI	X				21
	3						11
	5	KBPL		X			87
	7	KBSS	XD				74
	9						11
95	1	KVIC	X				8
	3						11
	5	KZFM				X	85
	7	KBOF	X				85
	9	KHMC	XD		OUT		18
96	1	KGUL	X				42
	3		A		YANKTN		28
	5	KLTG			X		81
	7						11
	9	KIOX			X		43
97	1						11
	3						11
	5	KFTX				XD	81
	7	KVCO	XD				21
	9	KITX			X		63
98	1						11
	3	KULM	X		PAL		63
	5						11
	7	KTXN			X		11
	9						11
99	1	KRYS			X		81
	3						11
	5	KISS				X	79
	7	KKOS			X		54
	9	KTXM	X				46

1	LOCAL KAJI					
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
32						
33						
34						
35						
36						
37						
38						
39						
40						
41						
42						
43						
44						
45						
46						
47						
48						
49						
50						
51						
52						
53						
54						
55						
56						
57						
58						
59						
60						
61						
62						
63						
64						
65						
66						
67						
68						
69						
70						
71						
72						
73						
74						
75						
76						
77						
78						
79						
80						
81						
82						
83						
84						
85						
86						
87						
88						
89						
90						
91						
92						
93						
94						
95						
96						
97						
98						
99						
100						

94.5  
94.7  
95.5  
96.3  
96.5  
97.3  
98.3  
98.3  
99.1  
3 OPEN  
5  
7  
9

LOCAL  
CITIZEN  
CO. 1  
CH. 200

1500 WATT

Prepared By

8

13

Channel	Frequency	Power	Distance	Signal	Notes
KATV	17.4	42	32.3	57.2	
KBSO		X			
KVIC		X			
KPM		X			
KQOP		X			
KTIME		X			
KTVB		X			
KLTG		X			
KIOX		X			
KFTX		X			
KVCO		X			
KHX		X			
NEW		X			
KTXN		X			
KRYS		X			
KISS		X			
KKOS		X			
KTXN		X			



17.4   24.2   32.3   44.7   57.2

1-10 watt			100 watt		
60 dbu	40 dbu	54 dbu	60 dbu	40 dbu	54 dbu
protect	co-chan	1st adj	protect	co-chan	1st adj
miles	miles	miles	miles	miles	miles
1.76	6.34	2.75	3.51	11.35	4.96

	Initial	Date
Prepared By	9	
Approved By		

WILSON JONES

[illegible][illegible]

R A DISTANCE TO BOUNDARY CLEARANCE 21 WATTS PER HOUR  
 166.62 CI 0 MILES - 0 + 0  
 17H 32.3 572 206 200

100	NEW	X	34	16.6
101	KEPG	A3	0	0
102	KWGN	X	20.3	0
103	KXGX	X	0	0
104	KXGX	X	0	0
105	KXGX	X	0	0
106	KXGX	X	0	0
107	KXGX	X	0	0
108	KXGX	X	0	0
109	KXGX	X	0	0
110	KXGX	X	0	0
111	KXGX	X	0	0
112	KXGX	X	0	0
113	KXGX	X	0	0
114	KXGX	X	0	0
115	KXGX	X	0	0
116	KXGX	X	0	0
117	KXGX	X	0	0
118	KXGX	X	0	0
119	KXGX	X	0	0
120	KXGX	X	0	0
121	KXGX	X	0	0
122	KXGX	X	0	0
123	KXGX	X	0	0
124	KXGX	X	0	0
125	KXGX	X	0	0
126	KXGX	X	0	0
127	KXGX	X	0	0
128	KXGX	X	0	0
129	KXGX	X	0	0
130	KXGX	X	0	0
131	KXGX	X	0	0
132	KXGX	X	0	0
133	KXGX	X	0	0
134	KXGX	X	0	0
135	KXGX	X	0	0
136	KXGX	X	0	0
137	KXGX	X	0	0
138	KXGX	X	0	0
139	KXGX	X	0	0
140	KXGX	X	0	0
141	KXGX	X	0	0
142	KXGX	X	0	0
143	KXGX	X	0	0
144	KXGX	X	0	0
145	KXGX	X	0	0
146	KXGX	X	0	0
147	KXGX	X	0	0
148	KXGX	X	0	0
149	KXGX	X	0	0
150	KXGX	X	0	0

60 dbu protect	40 dbu co-char	54 dbu 1st adj	60 dbu protect	40 dbu co-char	54 dbu 1st adj	100.1	100.3
7.46	25.97	10.91	8.8	31.58	13.15		
N	N	N	N	N	N		
LOCAL KEPG							
REGIONAL KXGX							
Y	N	Y	Y	N	Y	102.3	102.7
Y	N	Y	Y	N	Y	102.3	102.3
REGIONAL KOUL							
Y	N	Y	Y	N	Y	104.1	104.3
LOCAL KZAM							
LOCAL KMAT							
Y	N	Y	Y	N	Y	105.5	105.7

class of station---					distance	distance
A6	C3	c2	c1	c	distance to protected 60 dbu miles	cleared miles
17.4	24.2	32.3	44.7	57.2		

1-10 watt

100 watt

60 dbu	40 dbu	54 dbu
protect	co-chan	1st adj
miles	miles	miles
1.96	6.34	2.75

60 dbu	40 dbu	54 dbu
protect	co-chan	1st adj
3.51	11.55	4.96

LOCAL K LVB

LOCAL FIXES

106,1  
106,3  
106,5

107.3  
107.5

2000

1000 watt

repared By

12

B7113C BUFF      G7113C GREEN

174 242 323 447 512

4 5  
260 CH 260

60 dbu	40 dbu	54 dbu	60 dbu	40 dbu	54 dbu
protect	co-chan	1st adj	protect	co-chan	1st adj
7.4	25.97	10.91	8.8	31.58	13.15

1

1	106	KTMY
2	97	KCT
3	95	KTMY
4	94	KWJZ
5	93	KLUB
6	107	XGSR
7	92	XGGG
8	91	KXIN
9	90	KIXS

[illegible]

WOSR	N	Y	N	1063
LOCAL KLUB				
	N	Y		1073
LOCAL KKS				

# GRAND RE-CAPITULATION

Prepared By: 13  
 Approved By: 13

## NOTES

## NEW STATION CHANNELS

### PLAN ONE

TABOOS OPEN CHANNELS  
 COUCH 1ST 2ND 3RD 4TH  
 UNPAVED 1-10 100W 500W 1000W  
 LOC 4 30 PEN

### PLAN TWO

TABOOS  
 COUCH 1ST

22 22 20 20 CAM  
 1-10W 100W 500W 1000W

KITCHEN 1-10 100  
 500 OR 1000 WATTS

SAME

KITCHEN 89.7 AND/OR 90.1  
 UP TO 100 W  
 KITCHEN 89.9 AND/OR 90.3  
 UP TO 100 W  
 89.8 TO 500 W

91.1 UP TO 100 WATTS

91.9 UP TO 100 WATTS

92.7 OR 92.9  
 UP TO 1000 WATTS

PLAN ONCE

WILSON JONES TABS  
B7135 GUFF G7113C GREEN

7-6-65  
10-1-7  
10-1-7  
10-1-7

U = OPEN SEE

3529

PLAN TWO 1-10W 100W 500W 1000W

5342

[illegible]

500-500

937 to 1000 watts

80 / 94% 0394750 1000 Watts

955 TO 1000 WATTS

923 TO 100 WATS  
5/25 5:25  
5/26 5:26

973 To 1000 WPTS

DR 913 30120 WATS  
STAN 221 05126 WATS  
08, 70 120 WATS

PLAN ONE

PLAN TWO

Prepared By: 15  
Approved By:

DATE: 1/10/2010

PROJECT: 1000 W

CO-CH 18T 2ND 30 100 50 1000 W

1000 W

100 W 500 W 1000 W

NOTES

100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS

100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS

100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS

100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS  
100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

100 WATTS

# PLAY TWO

20257

子人子

WILSON JONES  
87113C BUFF  
G7113C GREEN

JONES G7113C BUFF G7113C GREEN CHA202-5

STATION 1005 0701

Model 1003 Model 1001 Model 1001

## NOTES

155

10

5

1

50

—



五

1701

3

5

7

١

— 6 —

5

151

三

3



70

2

# MASTER FINDINGS

2025 9

TABOOS + 3RD ART CHANNEL  
2ND " "  
1st " "  
CO-CHANNEL

USABLE OPEN CHANNELS  
SIMULTANEOUS CHANNELS

החל מיום  
הוא יצא  
למסע

[illegible]

1203 WATT  
11 EPU C  
3 EPU C

032519

00  
22

52 84 50-1 53L 59L

[illegible]

CANAL RADIUS  
WAS 1961  
1-10  
30  
MILES  
METER

120	30	251
200 WATT	60	746
35		
3 EDUC	60	5.8
21		
3 EDUC		



**MASTER FINDINGS OF PLAN ONE--CURRENT RULES-- VERSUS  
PLAN TWO--RELAXATION OF GUARD BAND TO ONLY ONE  
ADJACENT (OR FIRST ADJACENT CHANNEL) CHANNEL OF  
PROTECTION FOR EXISTING STATIONS VERSUS NEW LOW  
POWER STATIONS.**

PAGE 16.

At the cost of being non repetitive, for there is no need to be so, we go on to the findings of the two methods of allocations:

Plan one --- present fcc standards with taboos on first, second, and third adjacent channels of existing fm radio stations.

Plan two --- relaxation of the taboos on second and third adjacent channels.

**PLAN ONE**

Reader is best sent to the page 16 of tabular text to find the results of the two methods of allocations... One rule was used throughout... If a frequency could be used for a low power, it was then attempted to fit it with the next higher level of power. Several did not go all the way from 10 watts to 1000 watts. There are 11 usable open frequencies for 1 to 1000 watts, none being in the educational band of the spectrum-- that is 88.1 to 107.9 megahertz. Now one must determine if other limitations are there. The answer is positive. A number of these frequencies are located adjacent to each other, and can not be used simultaneously, thus the eleven is reduced to three separate simultaneous frequencies -- again none in the educational portion of the band.

**PLAN TWO**

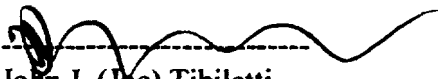
With the relaxation of second and third adjacent channel taboos in place the numbers opened up and there were some 55 usable 10 watt dial positions, 8 of which were in the educational portion of the band, of this 55 reduced to 47, the field was reduced from 47 to 42 as the cut was made from 100 watts to 500 watts, the educational fared no better as there were 8 for 100 watts and 3 for 500 watts who survived to 1000 watts., however this was not all usable channels at the same time and thus the number of simultaneous usable Channels was reduced to 24 for 10 watts, 24 for 100 watts, and 21 for 500 watts and 1000 watts, the educational found openings for 6 10 watters, 6 for 100 watters, 3 for 500 watters, and 3 for 1000 watters. Now reading this more carefully, if 21 were used at Maximum power of 1000 watts, there was space for only 3 who could operate at power up to 100 watts, while the educational band had 3 who could operate with 1000 watts, and 3 who could operate with up to 500 watts.

The assumption has been made that section 73.215 -- directional negotiated facilities -- would not be utilized, nor any variation in polarization from horizontal only, to vertical only to circular. There are possible sites where terrain might shield, but not here in Victoria, Texas where the terrain is to most visitors flat as a pancake.

Due to the fact that the market is close to the Gulf of Mexico, and its attendant higher wave refraction and dispersion --see VHF television channel locations and allocations along the coast which are spaced co-channel at 220 miles versus the 190 for inland stations-- wave usable distance increased over other areas --it is quite possible interference would be a much greater part in what stations facilities could be allocated and finally find their way to the air.... Also there will have to be a number of stations with smaller coverage areas, for example a 10 watt and 30 meters goes 1.96 miles to its protected 60 dbu, while a 100 watt on the same tower would go 3.51 miles, a 500 watt with the 60 meter height would go 7.46 miles and the 1000 watt would max out with 8.8 miles of coverage. KTXN has a permit for a 1000 foot tower and is in the process of promoting a community antenna farm, a number of these stations might have to find lesser valued transmission sites as their coverage would dictate central location in the city.

Submitted

November 5, 1999

  
John J. (Joe) Tibiletti  
2618 FM 1685  
Victoria, Texas, 77905

361-645-2487

for self and as President and  
chief stockholder of  
Radio Station KTXN-FM  
Victoria, Texas

# SOUND ENGINEERING

## AFTERTHOUGHTS

### In Standard Broadcasting or AM Radio

AFTER reviewing the whole tabular project, its whole fifteen plus pages and all, it comes as no surprise that the demon interference would show up in the final presentation. It does only as an afterthought. For years in the early days of standard broadcasting allocations and new stations, one could receive a grant that would receive and cause interference to up to ten per cent of the population and/or area within a .5 mv/m or protected contour. As a result whole counties of low population lost service to metropolitan stations ...several good examples were on the local channels of 1230, 1240, 1340, 1400, 1450, and 1490 where overlaps and duos of signal were commonplace. In the case of WOAI, 1200 San Antonio, a new station then called KLIF in Dallas on 1190 caused interference to whole massive county populations in north Texas because of the high populations of San Antonio and Dallas. This practice today in standard broadcast applications is no longer tolerated. In one recent case in Texas, an existing station on the standard broadcast band waited one year to object to a new proposal on an adjacent channel that would on paper at least cause interference to its protected daytime contour--with all territory in question a part of a dam, while another application along the Texas coast was diskmished becuase of interference -- overlaps of the protected contours of proposed and existing station -- occurred on an island in the Gulf of Mexico.

### In Frequency Modulation Radio or FM

While the Commission has specifically stated that interference to ten per cent of the population within the 60 dbu protected contour would be allowed for some of the low Power stations, I strongly oppose any such for it tends to bring down the sound and thus the apparent service of FM stations, which were started as a superior sound to the then standard broadcast band. I feel confusion would also occur as listeners would not know what the reason their station was not receivable without any degradation. However, there are exceptions : a number of stations in Canada interfere overlap U.S. stations over the surface of the Great Lakes.

2618 FM 1685  
Victoria, Texas  
November 5, 1999  
John J. (Joe) Tibiletti

